

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

FILED

JUN 03 2024

John Christensen  
Co-Plaintiff Andrew Sauners

(Enter the full name of the plaintiff.)

JOAN KANE, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY WFD, DEPUTY

v.

Case No. CIV-24-562-SLP  
(Court Clerk will insert case number)

- (1) Chris Anderson
- (2) Under Sheriff
- (3) CCDC

(Enter the full name of each defendant. Attach additional sheets as necessary.)

**PRO SE PRISONER CIVIL RIGHTS COMPLAINT**

Initial Instructions

1. You must type or legibly handwrite the Complaint, and you must answer all questions concisely and in the proper space. Where more space is needed to answer any question, you may attach a separate sheet.
2. You must provide a full name for each defendant and describe where that defendant resides or can be located.
3. You must send the original complaint and one copy to the Clerk of the District Court.
4. You must pay an initial fee of \$400 (including a \$350 filing fee and a \$52 administrative fee). The complaint will not be considered filed until the Clerk receives the \$402 fee or you are granted permission to proceed *in forma pauperis*.
5. If you cannot prepay the \$402 fee, you may request permission to proceed *in forma pauperis* in accordance with the procedures set forth in the Court's form application to proceed *in forma pauperis*. See 28 U.S.C. § 1915; Local Civil Rule 3.3.

**II. State whether you are a:**

- ☐ Convicted and sentenced state prisoner  
☐ Convicted and sentenced federal prisoner  
☒ Pretrial detainee  
☐ Immigration detainee  
☐ Civilly committed detainee  
☐ Other (please explain) \_\_\_\_\_

**III. Previous Federal Civil Actions or Appeals**

List each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility.

**1. Prior Civil Action/Appeal No. 1**

**a. Parties to previous lawsuit:**

Plaintiff(s): Andrew L. Saunders

Defendant(s): Canadian Co Sheriff

b. Court and docket number: ?

c. Approximate date of filing: ?

d. Issues raised: Deliberate Indifference  
to serious medical needs  
8th Amend. U.S. Constitution

e. Disposition (for example: Did you win? Was the case dismissed? Was summary judgment entered against you? Is the case still pending? Did you appeal?): Dismissed

f. Approximate date of disposition: ?

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on a separate sheet(s).

- If the court grants your request, the \$52 administrative fee will not be assessed and your total filing fee will be \$350.
- You will be required to make an initial partial payment, which the court will calculate, and then prison officials will deduct the remaining balance from your prison accounts over time.
- These deductions will be made until the entire \$350 filing fee is paid, **regardless of how the court decides your case.**

7. The Court will review your complaint before deciding whether to authorize service of process on the defendants. *See* 28 U.S.C. §§ 1915(e)(2), 1915A; 42 U.S.C. § 1997e(c)(1). If the Court grants such permission, the Clerk will send you the necessary instructions and forms.

8. If you have been granted permission to proceed *in forma pauperis*, the United States Marshals Service will be authorized to serve the defendants based on information you provide. If you have not been granted permission to proceed *in forma pauperis*, you will be responsible for service of a separate summons and copy of the complaint on each defendant in accordance with Rule 4 of the Federal Rules of Civil Procedure.

### COMPLAINT

#### **I. Jurisdiction is asserted pursuant to:**

       42 U.S.C. § 1983 and 28 U.S.C. § 1343(a)(3) (NOTE: these provisions generally apply to state prisoners), or

       *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971), and 28 U.S.C. § 1331 (NOTE: these provisions generally apply to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

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6. Do not include claims relating to your criminal conviction or to prison disciplinary proceedings that resulted in loss of good time credits.
- If a ruling in your favor “would necessarily imply the invalidity” of a criminal conviction or prison disciplinary punishment affecting the time served, then you cannot make these claims in a civil rights complaint unless you have already had the conviction or prison disciplinary proceeding invalidated, for example through a habeas proceeding.

### Claims

List the federal right(s) that you believe have been violated, and describe what happened. Each alleged violation of a federal right should be listed separately as its own claim.

1. **Claim 1:**

- (1) List the right that you believe was violated:

The 1st Amendment (Freedom of  
Religion) clause, an inalienable  
right restriction/limiting religious  
freedoms

- (2) List the defendant(s) to this claim: (If you have sued more than one defendant, specify each person or entity that is a defendant for this particular claim.)

Sheriff Chris Anderson  
Under Sheriff  
Cleveland County Detention  
Center

(3) List the supporting facts:

Per the Sheriff of Cleveland County Bibles have been systematically removed from the Facility as well as all other religious materials

(4) Relief requested: (State briefly exactly what you want the court to do for you.)

Return of all Bibles, Korans other religious material. Authorization to receive through mail some \$2 million to be allocated to rehabilitation

2. Claim II:

(1) List the right that you believe was violated:

The violation of Due process. 14 Amend US Const. Facility claims a policy change to religious freedoms yet did not provide CCDC population prior notice

(2) List the defendant(s) to this claim: (If you have sued more than one defendant, specify each person or entity that is a defendant for this particular claim.)

Sheriff Chris Amason  
Under Sheriff  
Cleveland County Detention  
Center



## Claim I Relief Sought Cont:

and pre-release programs and Funded construction of an in-house patient treatment and a real-life educational facility, providing employable job skills in order to assist recent releases to become productive members of society opposed to "looking up" people for million of Pones for profit at the tax payers expense.

Nominal relief of \$1 ~~00~~

Punitive relief in the amount of 10 million dollars. "No one is above the law," And those employed to enforce the laws of this nation should make every effort to protect ones' basic civil rights, no matter the circumstance or ones' station in life. CCDC has effectively made a mockery of the 1st Amendment of the U.S. Constitution, in that this Facility and staff under the authority delegated to the Sheriff has made the "Freedom of Religion" clause a privilege opposed to the inalienable Right the Founding Fathers intended it to be. CCDC's action have resulted in the undue stress of mental anguish and emotional trauma within the prisoner population. (see exhibit 1, 2, 3-8)



## Claim II Relief Sought

### Compensatory

When a policy change which affects the entire jail prisoner population, CCDC must comply with Due Process of The Law in accordance to the 14<sup>th</sup> Amendment of The US Constitution. Any policy change, prior to implementation prisoners throughout the facility should be given written notice of such changes, and this notification posted in each housing unit 30 days before going into effect, and or update Rule Book (see Ex. 7)

Nominal Relief;  
\$100

Punitive Relief:

Once again no one is above the law, especially those designated to enforce and uphold the law. The plaintiffs seek \$3.5 million in relief. IF the prisoner population is being held accountable for various infractions of the law, losing freedom, placing burdens upon family members, the stress caused and being incarcerated by one of the most excessive sentences in the country. Why, I ask this Honorable Court, should "trusted" officials be judged by a different standard of the justice system for violations (Add. Info, Ex. 9)

#### IV. Parties to Current Lawsuit

State information about yourself and each person or company listed as a defendant in the caption (the heading) of this complaint.

1. Plaintiff Bona Christensen  
co-Plaintiff Andrew L. Sawyers  
Name and any aliases: \_\_\_\_\_

Address: 2550 W Franklin Rd Norman

Inmate No.: 2022003055

2. Defendant No. 1

Name and official position: Chris Amason

Sheriff Cleveland County

Place of employment and/or residence: Cleveland

County Sheriff's Office

How is this person sued? ( ) official capacity, ( ) individual capacity, ( ☒ ) both

3. Defendant No. 2

Name and official position: Chris Amason Sheriff

Under Sheriff Cleveland County

Place of employment and/or residence: Cleveland

County Sheriff's Office

How is this person sued? ( ) official capacity, ( ) individual capacity, ( ☒ ) both

If there are more than two defendants, describe the additional defendants using this same format on a separate sheet(s).

Cleveland County Detention Center



**V. Cause of Action**

Instructions

1. *Provide a short and plain statement of each claim.*
  - Describe the facts that are the basis for your claim.
  - You can generally only sue defendants who were directly involved in harming you. Describe how each defendant violated your rights, giving dates and places.
  - Explain how you were hurt and the extent of your injuries.
2. *You are not required to cite case law.*
  - Describe the constitutional or statutory rights you believe the defendant(s) violated.
  - At this stage in the proceedings, you do not need to cite or discuss any case law.
3. *You are not required to attach exhibits.*
  - If you do attach exhibits, you should refer to the exhibits in the statement of your claim and explain why you included them.
4. *Be aware of the requirement that you exhaust prison grievance procedures **before** filing your lawsuit.*
  - If the evidence shows that you did not fully comply with an available prison grievance process prior to filing this lawsuit, the court may dismiss the unexhausted claim(s) or grant judgment against you. *See* 42 U.S.C. § 1997e(a).
  - Every claim you raise must be exhausted in the appropriate manner.
5. *Be aware of any statute of limitations.*
  - If you are suing about events that happened in the past, your case may be subject to dismissal under the statute of limitations. For example, for many civil rights claims, an action must be brought within two years from the date when the plaintiff knew or had reason to know of the injury that is the basis for the claim.

(3) List the supporting facts:

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(4) Relief requested: (State briefly exactly what you want the court to do for you.)

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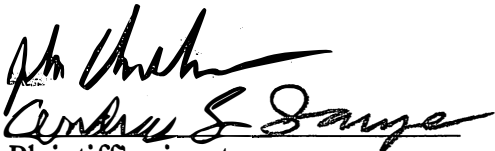
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If there are more than two claims that you wish to assert, describe the additional claims using this same format on a separate sheet(s).

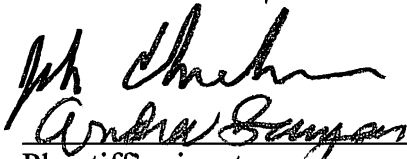
#### VI. Declarations

I declare under penalty of perjury that the foregoing is true and correct.

  
Plaintiff's signature

29 MAY 2024  
Date

I further declare under penalty of perjury that I placed this complaint in the prison's legal mail system, with the correct postage attached, on the 29 day of MA, 2024.

  
Plaintiff's signature

29 May 2024  
Date